

THE GRIFFITH FIRM

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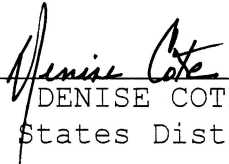
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April 1, 2022

Granted nunc pro tunc.
4/4/2020

VIA ECF

Hon. Denise Cote, U.S.D.J.
United States District Court for the
Southern District of New York
500 Pearl Street, Room 1910
New York, New York 10007


DENISE COTE
United States District Judge

Re: *Neuman v. Global Security Solutions, Inc., et al., Case No. 1:21-cv-01670-DLC*

Dear Judge Cote:

I represent Plaintiff Phil Neuman, who just filed his Motion for Partial Summary Judgment [59], Rule 56.1 Statement [60] and my supporting Declaration with annexed evidence [61]. Pursuant to paragraph 1.E of your Individual Practices, Mr. Neuman requests a one-day extension of the deadline to file his supporting memorandum of law, from today, April 1, 2022 until April 2, 2022:

- (1) The original deadline was March 18, 2022. *See* Pre-Trial Scheduling Order [22] at ¶ 5.
- (2) Pursuant to my March 15, 2022 letter motion, you extended the deadline until April 1, 2022.
- (3) You granted my first request for an extension and this is the second request.
- (4) I have not asked whether Defendants consent to this request because it is shortly before the midnight deadline to file this letter motion before the current deadline expires.

This request is necessary for me to complete the memorandum of law's tables and citations to evidence, which has taken longer than I expected. When I realized that I was unlikely to finish before the midnight deadline, I prepared this letter motion.

This short extension will not affect any other scheduled dates. Although your order granting my March 15, 2022 request stated that no further extensions would be considered,

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I respectfully request that you reconsider based on the following factors. First, Neuman has substantially complied with the April 1, 2022 deadline. Second, over the last two weeks, I have had an intense work schedule, including a week of depositions in Florida, meetings on the west coast, and several court filings in other matters. Finally, I am still not completely recovered from my kidney stone laser surgery on March 8, 2022.

Thank you for considering this request.

Sincerely,

/s/ Edward Griffith

Edward Griffith

EG:gb

cc: Terrence Worms, Esq.